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Attorneys for Plaintiffs

UNITED STATES DISTRICT COURT  
NORTHERN DISTRICT OF CALIFORNIA

TRUSTEES OF THE BRICKLAYERS LOCAL ) CASE NO. CV 10-4056 EMC  
NO. 3 PENSION TRUST; TRUSTEES OF THE )  
LOCAL NO. 7 PENSION TRUST; TRUSTEES )  
OF THE BRICKLAYERS LOCAL NO. 3 )  
HEALTH AND WELFARE TRUST; TRUSTEES ) PLAINTIFFS' REQUEST TO  
OF THE BRICKLAYERS AND ALLIED ) CONTINUE CASE MANAGEMENT  
CRAFTS LOCAL NO. 3 APPRENTICE ) CONFERENCE;  
TRAINING TRUST; INTERNATIONAL UNION ) [proposed] ORDER RESETTNG CASE  
OF BRICKLAYERS AND ALLIED ) MANAGEMENT CONFERENCE  
CRAFTSMEN, AFL-CIO, LOCAL UNION NO. 3, )  
on behalf of itself and as agent for its members; )  
TRUSTEES OF THE INTERNATIONAL UNION )  
OF BRICKLAYERS AND ALLIED )  
CRAFTSMEN PENSION FUND, )

Plaintiffs,

vs.

TOP GUN ARCHITECTURAL FINISHES )  
INCORPORATED, a California corporation; )  
AMERICAN CONTRACTORS INDEMNITY )  
COMPANY, a California corporation; )

Date: July 15, 2011  
Time: 9:00 a.m.  
Courtroom: 8, 19<sup>th</sup> Floor  
(San Francisco)

Defendants.

Pursuant to this Court's Civil Local Rule 16-9 and FRCivP 16(b), Plaintiffs hereby  
submit this Case Management Statement And Proposed Order.

Plaintiffs respectfully request that the Court continue the Case Management Conference

1 currently scheduled for July 15, 2011 for 75 days, until September 30, 2011, for the following  
2 reasons.

3 Judgment was entered as to Defendant Top Gun Architectural Finishes (“Top Gun”) on  
4 July 12, 2011.

5 Plaintiffs and Defendant American Contractors Indemnity Company (“ACIC”) are  
6 negotiating a settlement. Plaintiffs anticipate filing a request for dismissal of ACIC within 30  
7 days. Should Plaintiffs and ACIC fail to settle the dispute, a 75 day continuance will allow  
8 sufficient time for Plaintiffs to request the default of ACIC and move for default judgment.

9  
10 Respectfully submitted,

11 Katzenbach & Khtikian

12 Dated: July 13, 2010

13 By: /s/ Conor Mack  
14 Conor D. Mack  
15 Attorneys for Plaintiffs

16 **[proposed] ORDER**

17 Good cause appearing, the Court hereby orders that the Case Management Conference  
18 scheduled for July 15, 2011 is rescheduled for September 30, 2011 at 9:00 a.m. A joint case  
19 management conference statement shall be filed no later than September 23, 2011.

20 IT IS SO ORDERED

21  
22  
23  
24 Dated: 7/14/11

